

# NECHELES CASSIDY LLP

ATTORNEYS AT LAW

10 EAST 40<sup>TH</sup> STREET, 48<sup>TH</sup> FLOOR

NEW YORK, N.Y. 10016

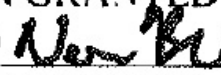
TELEPHONE: (212) 997-7400

TELECOPIER: (212) 997-7646

October 19, 2020

**Via ECF**

Hon. Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 10/20/2020

Re: *United States v. Louis Lluberes, et al*, 20-cr-493 (VSB)

Dear Judge Broderick:

We respectfully write to request that Your Honor modify slightly the terms of Mr. Louis Lluberes' bond to require four, not three, sureties (in addition to his wife.)

As Your Honor is aware, Mr. Lluberes appeared on October 7 before the Hon. Barbara C. Moses (U.S.M.J.). Among other terms, she required that Mr. Llubere's wife and three other FRP's co-sign his bond. Dkt. #20. Over the last week, we have held discussions with the government about who can act as sureties on the bond. We have now reached a compromise where four approved people (in addition to Ms. Lluberes) will sign the bond. We therefore respectfully request that the Court modify the terms of Mr. Lluberes' bail to require it to be signed by Mr. Lluberes' wife and *four* FRP's. The other conditions will all remain the same (and are already complied with.)

Respectfully submitted,

/s/

Susan R. Necheles

Gedalia Stern

cc: AUSA Daniel Nessim (via ECF)

AUSA Nicholas Chiuchiolo